

1. Plaintiffs is ARIELA ANNELI, and the Defendant is PHILIP JACK HAGEN.
2. On January 7, 2021, Plaintiff sued Defendant in the 73rd Judicial District Court of Bexar County, Texas, alleging Defendant's negligence caused an automobile accident.
3. Defendant was served with the lawsuit on January 18, 2021. Defendant files this notice of removal within the 30-day time period required by 28 U.S.C. §1446(b), as the deadline falls on Wednesday, February 17, 2021.
4. Removal is proper because there is complete diversity of citizenship between the parties. 28 U.S.C. §1332(a); *Johnson v. Columbia Props. Anchorage, L.P.*, 437 F.3d 894, 899-900 (9th Cir. 2006). Plaintiff is a citizen of the State of Texas, according to their allegations in the Plaintiff's Original Petition. At the time of the occurrence made the basis of this suit, Defendant was a citizen of the State of Delaware. Additionally, the amount in controversy exceeds \$75,000, excluding interest and costs (See Paragraph 17 of Plaintiff's Original Petition where she states that she is seeking damages in excess of \$1,000,000). 28 U.S.C. §1332(a).

5. Copies of all pleadings, process, orders, and other filings in the state-court suit are attached to this notice as required by 28 U.S.C. §1446(a) see **Exhibit “A”**.

6. Defendant will promptly file a copy of this notice of removal with the clerk of the state court where the suit has been pending.

### **C. JURY DEMAND**

7. Plaintiff did demand a jury in the state court suit.

### **D. CONCLUSION**

8. There is complete diversity between the parties, and Defendant is a citizen of a state other than Texas. Additionally, the amount in controversy exceeds \$75,000. For these reasons, Defendant asks the Court to remove the suit to the United States District Court for the Western District of Texas, San Antonio Division.

Respectfully submitted,

LAW OFFICES OF BRAD A. ALLEN  
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San Antonio, Texas 78216  
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A handwritten signature in blue ink, appearing to read "Dan Andrews", with a long horizontal line extending to the right.

BY: \_\_\_\_\_

DANIEL C. ANDREWS  
State Bar No. 01240940  
[DAN.ANDREWS@USAA.COM](mailto:DAN.ANDREWS@USAA.COM)  
ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this instrument has been forwarded, in accordance with the Texas Rules of Civil Procedure, to:

Mr. Philip Ripper  
The Law Office of Thomas J. Henry  
521 Starr Street  
Corpus Christi, Texas 78401  
pripper@tjhlaw.com  
(361) 985-0601

on this the 16<sup>th</sup> day of February, 2021.

A handwritten signature in blue ink, appearing to read "Dan Andrews", with a long horizontal flourish extending to the right.

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DANIEL C. ANDREWS